

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

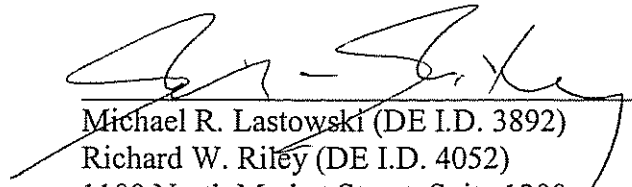
INTEGRATED HEALTH SERVICES OF)	
CLIFF MANOR, INC., INTEGRATED)	
HEALTH SERVICES AT RIVERBEND,)	Civil Action No. 04-910
INTEGRATED HEALTH SERVICES AT)	
SOMERSET VALLEY, INC., ALPINE)	
MANOR, INC., INTEGRATED HEALTH)	
GROUP, INC., SPRING CREEK OF IHS, INC.,)	
FIRELANDS OF IHS, INC., ELM CREEK OF)	
IHS, INC., and IHS LONG TERM CARE)	
SERVICES, INC.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
THCI COMPANY LLC,)	
)	
Defendant,)	
)	
)	

STATEMENT PURSUANT TO LOCAL RULE 7.1.1

Pursuant to D. Del. Local Rule 7.1.1, counsel for Movants state that, as set forth in the Declaration of Amos Alter, Esquire (filed contemporaneously herewith), counsel has made a reasonable effort to reach agreement with opposing counsel on the matters addressed by the portion of the Motion To Dismiss And Quash which seeks to quash the subpoenae addressed by

defendant to non-parties Leonard Grunstein and Rubin Schron, as well as to another nonparty, Uri Kaufman, and that such efforts were not successful.

DUANE MORRIS LLP



Michael R. Lastowski (DE I.D. 3892)
Richard W. Riley (DE I.D. 4052)
1100 North Market Street, Suite 1200
Wilmington, DE 19801-1246
Telephone: (302) 657-4900
Facsimile: (302) 657-4901
E-mail: mlastowski@duanemorris.com
rwiley@duanemorris.com

-and-

TROUTMAN SANDERS LLP

Amos Alter, Esquire
The Chrysler Building
405 Lexington Avenue
New York, NY 10174
Telephone: (212) 704-6000
Facsimile: (212) 704-6288
E-mail: Amos.Alter@troutmansanders.com

*Attorneys for Plaintiff Integrated Health
Services of Cliff Manor, Inc. et al., Counterclaim
Defendant Abe Briarwood Corp., Leonard
Grunstein and Rubin Schron*